

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Kevin McNulty  
v. : Crim. No. 12-540 (KM)  
FELIX ROQUE and : PROTECTIVE ORDER  
JOSEPH ROQUE, : ON CONSENT  
a/k/a "Maria Pasquale" :  
a/k/a "Jeffery Reynoso"

This matter having been opened to the Court upon the application of the United States, by Paul J. Fishman, United States Attorney (Barbara R. Llanes, Assistant U.S. Attorney, appearing), for a protective order pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, limiting the use and disclosure of protected materials that will be provided to defense counsel pursuant to the Court's standing discovery order, to include (a) search warrant applications and affidavits unsealed for the purpose of discovery in the instant case; (b) computer hard drive and personal computers of any third parties; (c) recorded conversations of the defendants and others; (d) investigative agency reports; and (e) materials and/or information relating to uncharged third parties and/or ongoing investigations, which have been or will be made available to counsel for the defendants (collectively, the "Protected Materials"), and the Court, with the consent of the parties, and for good cause shown, having found that such an order should be entered,

WHEREFORE, IT IS on this 4<sup>th</sup> day of <sup>September</sup> ~~August~~, 2012,

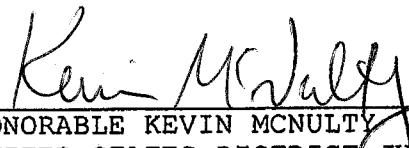
ORDERED that:

1. The Protected Materials shall not be disclosed to anyone other than the defendants, defendants' counsel, and any employee or agent working at the direction of defense counsel in this matter;

2. The Protected Materials will be used only in the preparation of the defense in this case and, notwithstanding the provisions of Paragraph 1, the defense shall be permitted to review, with prospective witnesses and their counsel, all materials referenced in Paragraph 1 to the extent necessary to prepare the defense;

3. Notwithstanding any other provision of this Order, the defense shall be permitted to disclose the Protected Materials in connection with the filing of any defendants' motions with the Court, or for use at trial; and

4. If there is a need prior to trial or during trial to disclose the Protected Materials beyond that permitted by this Order, then defendants will make an application to the Court, upon notice to the government, requesting such authorization.

  
HONORABLE KEVIN MCNULTY  
UNITED STATES DISTRICT JUDGE

Accepted and Acknowledged:

PAUL J. FISHMAN  
UNITED STATES ATTORNEY

BY: Barbara Llanes  
BARBARA R. LLANES  
Assistant U.S. Attorney

John A. AZZARELLO

JOHN A. AZZARELLO, ESQ.  
Counsel for defendant Joseph Roque

Bryan Blaney

BRYAN BLANEY, ESQ.  
Counsel for defendant Felix Roque